EPA Form 8700-12 (6-80)

Please go to the reverse of this form and provide the requested information.

A. HAZARDOUS WASTES	The state of the s		THE RESERVE TO A PERSON NAMED IN COLUMN 2	40 CER Part 261 31 fo	r each listed hazardous
A. HAZARDOUS WAS I ES waste from non—specific	sources your installation	handles. Use additions	tour—aight number from al sheets if necessary.	140 CFN Part 201.31 10	r each histed hazardous
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B. HAZARDOUS WASTES				R Part 261.32 for each	listed hazardous waste from
specific industrial sources	s your installation handle	s. Use additional sheets	if necessary.		
13	14	15	16	17	18
23 - 26	23 - 26	23 - 26	22 - 26	23 - 26	23 - 26
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TANKE L. L. T. PERE				22	
C. COMMERCIAL CHEMIC	CAL PRODUCT HAZAR	DOUS WASTES. Enter	the four-digit number	from 40 CFR Part 261.3	33 for each chemical sub-
stance your installation h	nandles which may be a h	azardous waste. Use ad	ditional sheets if necessa	iry.	
31	32	33	34	35	36
4002	4031	4069	4154	4159	11220
23 - 26	23 - 26	23 26	23 26	23 - 25	23 - 26
37	38	39	40	41	42
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43	44	45	46	47	48
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D. LISTED INFECTIOUS V	VASTES Enter the four			ch listed hazardous wast	
hospitals, medical and re	search laboratories your	installation handles. Us	e additional sheets if ne	cessary.	
49	50	51	52	53	54
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E. CHARACTERISTICS OF	F NON-LISTED HAZAF stallation handles. (See	RDOUS WASTES. Mar 40 CER Parts 261.21 —	k "X" in the boxes corre	sponding to the charact	eristics of non—listed
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(DOOT)	BLE (D	2. CORROSIVE	3. REAC (D003)	TIVE	4. TOXIC
X. CERTIFICATION	SEAL OF THE PARTY				
	y of law that I have	personally avaminad	and am familiar wit	h the information su	hmitted in this and all
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information,					
I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.					
	on, including the possi			X II.	
SIGNATULE	1/2	NAME & OF	E'S TISTURY	print)	DATE SIGNED
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U.S. Operations: La Crosse, Wisconsin - Headquarters Black River Falls, Wisconsin Franklin, Indiana Postville, Iowa European Operation: Wipperfürth, West Germany Pacific Headquarters: Kowloon, Hong Kong

August 13, 1980

RE: Norplex Division Postville Plant

EPA ID No. IAD073489288

## Gentlemen:

Please be advised that this facility is also equipped with a laboratory that has small amounts of chemicals on hand which (while not waste materials right now as defined by RCRA) may become hazardous waste in the future (as enumerated in Part 261.33).

We intend to handle any waste generated from the laboratory in a manner consistent with federal regulations.

Should you require any further assistance relating to the above, please feel free to contact us.

Sincerely,

NORPLEX DIVISION

UOP Inc.

George J. Stunyo

Manager, Industrial Relations

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Norplex Division 1300 Norplex Drive · LaCrosse, Wisconsin 54601 Telephone 608 · 784 - 6070 · Telex 29 - 3422

August 13, 1980

U.S. Operations: La Crosse, Wisconsin - Headquarters Black River Falls, Wisconsin Franklin, Indiana Postville, Iowa

European Operation: Wipperfürth, West Germany Pacific Headquarters: Kowloon, Hong Kong

## To Whom It May Concern:

No specific claims of confidentiality are being made with respect to the information being provided herewith due to the very general nature of the information requested. However, UOP hereby reserves the right to raise specific claims of confidentiality with respect to any other information that may be required to be submitted whether as part of this filing or any other filing. Nothing contained herein shall be construed as a waiver of any right to raise any such confidentiality claims.

Sincerely,

NORPLEX DIVISION

UOP Incy.

George J. Stunyo

Manager, Industrial Relations



August 13, 1980

U.S. Operations: La Crosse, Wisconsin - Headquarters Black River Falls, Wisconsin Franklin, Indiana Postville, Iowa European Operation: Wipperfürth, West Germany Pacific Headquarters: Kowloon, Hong Kong

## Gentlemen:

The installation which is the subject of the enclosed notification has not been and is not being operated as a Treatment or Disposal facility as these terms are defined under the EPA regulations governing hazardous wastes (40 CFR, part 261.3, promulgated May 19, 1980). However, we are currently storing hazardous wastes on an intermittent basis. Our current and future planned operations would result only in the classification of the installation as a Generator of hazardous wastes. Such hazardous wastes generated in our operations will be turned over to properly identified Transporters for disposal in properly permitted or interim status Treatment, Storage or Disposal Facilities under the manifest system in full compliance with the regulations.

We are concerned, however, that the Treatment, Storage and Disposal facilities which we are currently relying upon may, for one reason or another, become unavailable to us at some point in time. In such event, we could, for reasons beyond our control, find our installation facing the problem of operating as a storage facility merely because we are unable to locate a suitable alternate receiving facility within the 90-day time limit imposed by the regulations. Unless there is some relief under the regulations or unless we are properly permitted as a storage facility, we would probably have no option but to close down the operations of the installation. There is little likelihood that our processing schemes could be modified to achieve total recycle of all hazardous wastes within such period.

To protect against such eventuality, we have checked Block 59 in Section VI of EPA Form 8700-12 (6-80) indicating installation activity as a Treatment, Storage or Disposal Facility and are considering the decision of applying for a permit for such activity by the November 19, 1980, deadline set by the regulations. We recognize that this procedure will result in additional work for EPA in the review and approvals of permit applications but see no alternative if we are to protect the future of our operations.

Any advice or comments you might offer concerning alternatives that would adequately protect our future operations, minimize the work burden on EPA and still afford the desired protection of our environment would be most sincerely appreciated.

George J. Stunyo

Manager, Industrial Relations